

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

RICK SCOTT, ROYCE D. KLEIN,
JAMES MORRIS, and THOMAS
MANGUM, on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

UNITEDHEALTH GROUP, INC.,
UNITED HEALTHCARE SERVICES,
INC., UNITED HEALTHCARE
INSURANCE COMPANY, and UNITED
HEALTHCARE SERVICE LLC,

Defendants.

Civ. No. 20-1570 (PJS/BRT)

**DEFENDANTS' MOTION TO
DISMISS PLAINTIFFS' AMENDED
COMPLAINT**

Defendants UnitedHealth Group Incorporated, United Healthcare Services, Inc., UnitedHealthcare Insurance Company, and UnitedHealthcare Service LLC (collectively, “United”) respectfully move the Court for an Order dismissing the Amended Complaint with prejudice in its entirety. This Motion is made pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure.

This Motion is supported by all the files, records, and proceedings herein, including United’s supporting memorandum of law and declaration.

Dated: November 20, 2020

s/ Michelle S. Grant

Michelle S. Grant (#311170)
DORSEY & WHITNEY LLP
50 South Sixth Street, Suite 1500
Minneapolis, Minnesota 55404
(612) 340-2600

Brian D. Boyle (*pro hac vice*)
Jonathan D. Hacker (*pro hac vice*)
O'MELVENY & MYERS LLP
1625 Eye Street, NW
Washington, DC 20006
(202) 383-5300

Elizabeth L. McKeen (*pro hac vice*)
O'MELVENY & MYERS LLP
610 Newport Center Drive, 17th Floor
Newport Beach, California 92660
(949) 823-6900

Amanda L. Genovese (*pro hac vice*)
O'MELVENY & MYERS LLP
7 Times Square
New York, New York 10036
(212) 326-2000

Attorneys for Defendants